Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

JUN 18 2004

ENTERED

Mr. Steve Zappe, WIPP Project Leader
Hazardous Waste Permits Program
Hazardous Waste Bureau
New Mexico Environmental Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Response to Request for Information, Comprehensive Monitoring Evaluation

Dear Mr. Zappe:

The Department of Energy (DOE) and Washington TRU Solutions (WTS), together, the Permittees, are providing to you via this letter and accompanying attachments the information requested both before and after your Comprehensive Monitoring Evaluation (CME) of May 18 through 19, 2004.

The inventory of information being provided (attached, Table 1) completes the requests that were made by the following communications:

- E-mail from Mr. Steve Zappe to Mr. H. L. "Jody" Plum, May 12, 2004, 3:27 p.m.
- Clarification of requests contained in the above e-mail based on a conference call with Mr. H. L. "Jody" Plum, WRES (Mr. Joel Siegel, Mr. Mark Crawley, Mr. Ron Richardson, Mr. Mel Balderrama, Mr. Stewart Jones, and Mr. Ron Reeves) and NMED (Mr. Steve Zappe and Mr. Carl Chavez) on Tuesday, June 8, 2004.
- E-mail from Mr. Carl Chavez to Mr. H. L. "Jody" Plum, June 8, 2004, 1:23 p.m.

Changes to Previously Submitted Information

Many of the items on Table 1 were e-mailed in three parts to Mr. Carl Chavez on Tuesday, June 8, 2004, following the conference call. The following two items in this package are different (both in hard copy and the CD-ROM) from the files previously sent via those e-mails. Please discard earlier versions:

- Standard Operating Procedure listing has been updated to show that our laboratory uses EPA 9020B as opposed to 9020A for Total Organic Halogens. The revised Excel file name is "Contract Lab SOPs-WRES".
- The hard copy and electronic data file (in Excel format) for calendar year 2002 water level data now include information for well WQSP-2 and are entitled, "H20lev02 – revised".

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Other Questions:

Question:
NMED requested a description of any other changes (e.g., transmissivity, statistical methods, etc.) to the Detection Monitoring Program since the Hazardous Waste Facility Permit (HWFP) was issued. NMED requests that this information be disclosed to them so that the CME report accurately represents any changes since the HWFP was issued.

Response:
There have been no changes to transmissivity or statistical methods since issuance of the HWFP Permit.

Question:
NMED also discussed preliminary findings after sampling of the WQSP-6 well on May 19, 2004, and during the closeout meeting. Prior to May 19, 2004, filtering of Total Organic Halogen (TOX) samples was performed by WRES at the request of WTS's subcontract laboratory. The NMED asserts that the HWFP does not allow for the filtering of TOX samples and for the May 19, 2004, sampling, and the balance of Round 18 (WQSP-6A), TOX samples were not filtered. You asked, "Are the Permittees planning to deviate from the Permit requirements?" The NMED is requesting confirmation that TOX samples will not be filtered.

Response:
The Permittees will not filter future TOX samples until this matter is resolved with NMED. The Permittees recommend filtering for TOX in the future, because Method 9020B requires the samples to be free of un-dissolved solids. Although total suspended solids (TSS) are low for all water from WQSP wells at WIPP, the Permittees believe that filtering will improve the comparability between primary and duplicate sample analysis for TOX for the same well in any given round. We would like to get concurrence from NMED on this going forward. We would like to discuss this and other potential modifications to the HWFP that the Permittees believe are justified.

Question:
NMED noted during the serial sampling of the indicator parameters that specific conductivity, alkalinity, chloride, cations, and total iron samples did not appear to be filtered before analysis. Please confirm whether these samples were filtered or not filtered and if not filtered, explain why the sample procedure WP 02-EM1005 Revision 4 "Groundwater Serial Sample Analysis" may not have been followed?

Response:

The serial sample for these indicator parameters was filtered. It takes a very short time to place the filter and this action evidently was not noticed. The Permittees would like the opportunity to address all remaining questions related to sample filtering and preservation with you in the near future.

We certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,

R. Paul Detwiler
Acting Manager
Carlsbad Field Office

S. D. Warren
General Manager
Washington TRU Solutions LLC

Attachment

cc: With attachment
C. Walker, Trinity Engineering
L. Piper
CBFO M & RC

cc: Without attachment
J. Kieling, NMED
J. Bearzi, NMED
G. Basabilvazo, CBFO
S. Casey, CBFO
D. Mercer, CBFO
J. Plum, CBFO
C. Zvonar, CBFO

CBFO:OEC:HJP:JGW:04-0390:2300

Attachment 1.

INVENTORY OF MATERIALS BEING PROVIDED TO NMED

Items Included	Hard Copy	CD	Electronic Form (If Applicable)
Groundwater RIDS	Yes	Yes	PDF
Two WIPP Procedures: WP02-RC.01 WP10-AD3029	Yes	Yes	PDF
List of Trace SOPs	Yes	Yes	Excel
Trace SOPs	Yes	No	N/A
Groundwater Level Data Base Sheets	Yes	Yes	Excel
Groundwater Monitoring Plan	Yes	Yes	PDF
Current Calibration Records	Yes	No	N/A
WQSP-6, Round 18, Field Logbook Pages	Yes	No	N/A
Photos of WQSP-3	No	Yes	JPEG
Current Site Map and Aerial Photo	Yes	No	N/A
Surveyed Elevations for WQSP Wells	Yes	No	N/A
Well/Submersible Pump Diagram	Yes	No	N/A

CBFO:OEC:HJP:JGW:04-0390:2300